



Justin Lonergan  
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Attorneys for Andrei Borgheriu

United States District Court  
Eastern District of Washington  
Honorable Stanley A. Bastian

United States of America,

Plaintiff,

V.

Andrei Stephanovich Borgheriu,

## Defendant.

No: 4:22-cr-06040-SAB-1

## Defendant's Witness List - First

1 Mr. Borgheriu, through counsel, provides notice that he may call any of the  
2 following witnesses at trial:

- 3 1. Artur Sherepitka
- 4 2. Inna Borgheriu
- 5 3. Nikica Lacic (if not called by government in its case in chief)
- 6 4. Dylan Strait (if not called by government in its case in chief)
- 7 5. Rick Unser

8 Mr. Borgheriu reserves the right to call any witness listed on the United  
9 States witness list, to call witnesses in rebuttal, or to modify this witness list as trial  
proceeds for any reason.

10 Dated: February 3, 2025

11 Federal Defenders of Eastern  
12 Washington and Idaho  
13 Attorneys for Andrei Borgheriu

14 *s/Justin Lonergan*  
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## **SERVICE CERTIFICATE**

I hereby certify that, on February 3, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will notify Assistant United States Attorneys Frieda K. Zimmerman and Jeremy James Kelley.

s/Justin Lonergan  
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